



1 **RAMZY P. LADAH, ESQ.**
Nevada Bar No. 11405
2 **MICHAEL T. NIXON, ESQ.**
Nevada Bar No. 012839
3 **LADAH LAW FIRM**
4 517 S. Third Street
Las Vegas, NV 89101
5 litigation@ladahlaw.com
T: 702.252.0055
6 F: 702.248.0055
7 *Attorneys for Plaintiff*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

10 RONALD JACKSON, individually,
11 Plaintiff,

12 vs.

13 VONS COMPANIES INC dba VONS
14 GROCERY STORE; ASSEMBLED
15 PRODUCTS CORPORATION DBA MART
16 CART; ROE MAINTENANCE COMPANY;
17 DOES I through XXX, inclusive and ROE
BUSINESS ENTITIES I through XXX,
inclusive,

18 Defendants.

CASE NO.: 2:23-cv-00711-GMN-NJK

**STIPULATION AND ORDER TO
AMEND THE COMPLAINT TO
REMOVE MART CART AND
SUBSTITUTE AMIGO MOBILITY
INTERNATIONAL, INC. AS THE
PROPER DEFENDANT**

19 Plaintiff RONALD JACKSON, by and through his attorney of record, RAMZY P. LADAH,
20 ESQ. and MICHAEL T. NIXON, ESQ. of LADAH LAW FIRM, and Defendant VONS
21 COMPLANIES INC. dba VONS GROCERY STORE, by and through their attorney of record, LEW
22 BRANDON, JR., ESQ. and RYAN M. VENCI, ESQ. of BRANDON / SMERBER LAW FIRM,
23 hereby stipulate as follows:

24 **IT IS STIPULATED AND AGREED** that the parties have already voluntarily dismissed
25 Defendant ASSEMBLED PRODUCTS CORPORATION DBA MART CART with prejudice, all
26 sides to bear their own fees and costs;

27
28 ///



IT IS FURTHER STIPULATED AND AGREED that Plaintiff may file a Second Amended Complaint for the purpose of removing ASSEMBLED PRODUCTS CORPORATION DBA MART CART from the Caption, and to include as proper Defendant the manufacturer AMIGO MOBILITY INTERNATIONAL, INC., who was previously dismissed based in part on Amigo's counsel's errant representations that Amigo was not the proper defendant, which now has been conclusively established and Amigo is in fact the proper defendant and manufacturer.

IT IS SO AGREED.

Dated this 11th day of June 2024.

Dated this 11th day of June 2024.

LADAH LAW FIRM

BRANDON / SMERBER LAW FIRM

/s/ Ramzy P. Ladah Esq.

/s/ Ryan M. Venci, Esq.

RAMZY PAUL LADAH, ESQ.

LEW BRANDON, ESQ.

Nevada Bar No. 11405

Nevada Bar No. 5880

MICHAEL T. NIXON, ESQ.

RYAN M. VENCI, ESQ.

Nevada Bar No. 012839

Nevada Bar No. 7547

517 S. Third Street

DANIELLE A. KOLKOSKI, ESQ.

Las Vegas, NV 89101

Nevada Bar No. 8506

Attorneys for Plaintiff Ronald Jackson

139 E. Warm Springs Road

Las Vegas, Nevada 89119

*Attorneys for Defendant, Vons Companies, Inc.
dba Vons Grocery Store*

ORDER

IT IS SO ORDERED.

Dated: June 18, 2024


United States Magistrate Judge